

# COFFEY | BURLINGTON

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November 29, 2023

**VIA CM/ECF**

Honorable Jesse M. Furman, District Judge  
United States District Court, Southern District of New York  
Thurgood Marshall, United States Courthouse  
40 Foley Square  
New York, NY 10007

**Re: USA v. Alvaro Lopez, et al., USDC, Southern District of New York  
Case No. 23-cr-133-JMF**

Dear Judge Furman:

We represent Alvaro Lopez in the above-referenced matter. We write to request a modification of Mr. Lopez' bond conditions to include travel to Lima, Peru from December 17-27 to attend to the Peruvian legal guardianship proceedings of his sister and niece. As part of the bond modification, Mr. Lopez would also need his United States passport temporarily returned to him by Pre-Trial Services prior to his trip. Upon his return from Lima, Peru, he would surrender the passport back to Pre-Trial Services.

Mr. Lopez' travel currently is restricted to the Southern Districts of Florida and New York. Accordingly, we respectfully request that Mr. Lopez's bond be modified to add Lima, Peru to the list of locations in which Mr. Lopez is permitted to travel.

We have conferred with AUSA Reilly and Pre-Trial Services, who are copied here, and they have confirmed that they have no objection to this request. We will provide both AUSA Reilly and her team, as well as Pre-Trial Services, with Mr. Lopez's travel itinerary, the address of where he will stay in Lima, Peru, and any other trip information that is requested.

Respectfully submitted,

/s/ Fernando L. Tamayo

Fernando L. Tamayo

FT/lm

Application GRANTED. (To be clear, Mr. Lopez is granted permission to travel to Lima, Peru only on the dates set forth above; his travel restrictions otherwise remain unchanged.) The Clerk of Court is directed to terminate Docket No. 159. SO ORDERED.

November 29, 2023